

The Honorable J. Kelley Arnold

AGREED PROTECTION
ORDER, RE; MEDICAL
RECORDS

ORDERS, ADJUDGES AND DECREES that:

- PROTECTION ORDER,
RE: MEDICAL RECORDS - 1

1 obtained by Counsel for the Defendant may be shared with and reviewed by the Defendant and/or
2 their representatives, but any records related to health care received by the Plaintiff Stanley Willms
3 IS and the SAME SHALL BE PROTECTED from delivery, transferal or dissemination in any
4 physical or electronic form to the Defendant and/or their representatives (except experts hired by
5 counsel for the Defendant); PROVIDED, the Defendant and/or their representatives may, in
6 assisting legal counsel at deposition or in a court proceeding, review or have contact with copies of
7 the health care records.
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9 3. Counsel for Defendant IS and the SAME SHALL BE PROHIBITED FROM
10 delivering, transferring or disseminating copies of the health care records of the Plaintiff, Stanley
11 Willms, to any person who is not a member of the staff of legal counsel for Defendant or an expert
12 engaged to review, analyze or testify about the health care records of the Plaintiff, Stanley Willms
13 unless there is further order of the court.
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15 **DATED the 23rd day of August, 2006.**
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18 /s/ J. Kelley Arnold
19 U.S. Magistrate Judge
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21 Presented by:
22

23
24 Approved as to Form and Content;
25 Notice of Presentation Waived:
26

25 Michael Hanbey, WSB# 7829
26 Attorney for Plaintiffs

Kristin L. Bremer, OSB # 03274
Attorney for Defendant